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9 Attorneys for Defendant
Aetna Life Insurance Company
10 (*Pro Hac Vice*)

11 **UNITED STATES DISTRICT COURT**

12 **DISTRICT OF NEVADA**

13 DAVID SHAFFER,)	CASE NO.: 2:18-cv-02357-JAD-VCF
)	
14 Plaintiff,)	
)	<u>STIPULATION AND ORDER TO</u>
15 vs.)	<u>EXTEND DEADLINE</u>
)	
16 AETNA LIFE INSURANCE COMPANY,)	<u>(SECOND REQUEST)</u>
as Claims Administrator for Advenir Real)	
17 Estate Management, LLC Welfare Plan,)	
)	
18 Defendants.)	
)	
19)	
20)	

21 IT IS HEREBY STIPULATED by the parties hereto, by and through their
22 undersigned counsel of record that, pursuant to LR 26-4, the discovery schedule as set forth
23 in the Scheduling Order dated May 13, 2019 [docket 19], be amended as follows:

24 **I. Discovery Completed**

25 Defendant provided the proposed Administrative Record (AR) to Plaintiff for review
26 on March 26, 2019. Counsel for the parties met and conferred by phone on April 17, 2019

1 regarding potential discovery and content of the AR. Plaintiff served discovery requests
2 upon Defendant and Defendant's responses have been provided.

3 **II. Discovery Remaining and Reason for Request for Extension**

4 The parties now have a dispute as to a few of Defendant's discovery responses which
5 they believe will be resolved shortly without the need for Court intervention. The current
6 deadline to file discovery briefs in this case is 7/29/19. The parties have agreed among
7 themselves to extend this sole deadline by approximately two weeks, to August 15, 2019.
8 All other deadlines will remain unchanged.

9 **III. Proposed Discovery Schedule Change**

10 Plaintiff SHAFFER and Defendant AETNA agree and stipulate to the following
11 proposed deadline extension:

<u>Description:</u>	<u>Current Deadline:</u>	<u>Proposed:</u>
Discovery Briefs	07/29/19	08/15/19

14 We, the undersigned, represent to the Court that this request for extension is made in
15 good faith and not for purposes of delay.

16 WHEREFORE, the parties jointly request that this Court adopt the proposed
17 scheduling deadlines as indicated above.

18 DATED: July 29, 2019

BURKE, WILLIAMS & SORENSEN, LLP

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20 By: /s/ Michael B. Bernacchi
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DATED: July 29, 2019

LAW OFFICE OF JULIE A. MERSCH

By: /s/ Julie A. Mersch
JULIE A. MERSCH
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Attorney for Plaintiff SHAFFER

IT IS SO ORDERED:

Dated this 29th day of July, 2019.



UNITED STATES MAGISTRATE JUDGE